RECEIVEOR THE UNITED STATES DISTRICT COURT
NORTHERN DIVISION

2005 JUL 13 🖯 3: 41	
MAGNOLIA CLARK, et al., LEBKA P. HACKETT, OLT U.S. DISTRICT COURT HIPlaintiffs, TRICT ALA	) ) )
v.	) CIVIL ACTION NO. 2:05-cv-532-T
LIBERTY NATIONAL LIFE INSURANCE COMPANY,	) )
Defendant.	)

## PLAINTIFFS' RESPONSE AND CONSENT TO LIBERTY NATIONAL LIFE INSURANCE COMPANY'S MOTION TO TRANSER

Plaintiffs hereby CONSENT to the transfer of this action to the United States District Court for the Northern District of Alabama, so that it may then be consolidated with *In re Liberty National Insurance Cases* (2:02-cv-2741-UWC), as other similar cases filed by this firm and others have been. Such transfer will promote judicial economy and the timely resolution of the plaintiffs' claims. As such, it is respectfully submitted that Liberty National's Motion to Transfer, filed June 28, 2005, should be granted.

W. Daniel "Dee" Miles

## **OF COUNSEL**

Jere L. Beasley, Esq. C. Gibson Vance, Esq. Beasley, Allen, Crow, Methvin, Portis & Miles, P.C. 272 Commerce Street P.O. Box 4160 Montgomery, AL 36103-4160 I hereby certify that I have this date served the above and foregoing on:

Michael R. Pennington Anne Marie Seibel BRADLEY ARANT ROSE & WHITE LLP One Federal Place 1819 Fifth Avenue North Birmingham, AL 35203-2104

Scott B. Smith, Esq. BRADLEY ARANT ROSE & WHITE LLP 200 Clinton Avenue West, Suite 900 Huntsville, AL 35801-4900

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by placing a copy of same in the United States Mail, first-class postage prepaid, on this day of July, 2005.

OF COUNSEL